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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 GILBERT R. ROUSSEAU,
15 Defendant.

Case No. 2:16-cr-097-KJD-EJY-1

**STIPULATION TO CONTINUE
SENTENCING
HEARING**
(Fourteenth Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
17 United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel for
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and Brian
19 Pugh, Assistant Federal Public Defender, counsel for Gilbert R. Rousseau, that the Sentencing
20 and disposition Hearing currently scheduled on September 13, 2022, at 11:00 a.m., be vacated
21 and continued to a date and time convenient to the Court, but no sooner than one hundred and
22 ninety (90) days.
23

24 This Stipulation is entered into for the following reasons:
25
26

1 1. Counsel for the defendant needs additional time to gather mitigation
2 information for Mr. Rousseau, which is relevant to the sentencing disposition of this case.
3 Furthermore, Mr. Rousseau was originally charged by information after reaching a plea
4 agreement without the benefit of discovery. The government has agreed to allow the defense
5 to view discovery to prepare for sentencing. The government is preparing discovery for
6 disclosure to the defense. The government believes it can disclose discovery to the defense
7 within 90 days.
8

9 2. The defendant is not in custody and agrees with the need for the continuance.

10 3. The parties agree to the continuance.
11

12 This is the fourteenth request for a continuance of the Sentencing and Disposition
13 hearing.

14 DATED this 6th day of September 2022.

15
16 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

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18 By /s/ Brian Pugh

19 BRIAN PUGH
20 Assistant Federal Public Defender

By /s/ Daniel J. Cowhig

DANIEL J. COWHIG
Assistant United States Attorney

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GILBERT R. ROUSSEAU,

Defendant.

Case No. 2:16-cr-097-KJD-EJY-1

ORDER

Based upon the stipulation of the parties and good cause appearing therein, IT IS ORDERED that the Sentencing hearing currently scheduled for September 13, 2022 at 11:00 a.m., be vacated and continued to December 6, 2022 at the hour of 10:00 a.m.; or to a time and date convenient to the court in courtroom 4A.

DATED this 6th day of September 2022.



UNITED STATES DISTRICT JUDGE